

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

United States of America,)	
)	
)	
v.)	
)	Case No. 3:25-cr-00115
)	Judge Crenshaw
Kilmar Abrego Garcia)	Judge Holmes
)	
Defendant.)	
)	
)	

Motion to Substitute Counsel

Defendant Kilmar Abrego Garcia, by and through his undersigned counsel, hereby moves this Court for the entry of an Order substituting Rascoe Dean, Sean Hecker, Jenna Dabbs, and David Patton as counsel of record for Mr. Abrego Garcia and relieving Federal Public Defender Dumaka Shabazz and Assistant Federal Public Defenders Will Allensworth, Richard Tennant, and Richard Thomason of other or further responsibility in this cause. In support thereof, Mr. Abrego Garcia states as follows:

1. Federal Public Defender Dumaka Shabazz and Assistant Federal Public Defenders Will Allensworth, Richard Tennant, and Richard Thomason were originally appointed to represent Mr. Abrego Garcia in this matter. (Order Appointing Federal Public Defender, DE 11, Page I.D. #53).

2. On June 14, 2025, Mr. Abrego Garcia's family asked undersigned counsel to represent him in this matter, and on June 16, 2025, Mr. Abrego Garcia conveyed directly to the Federal Public Defender's Office that he would like undersigned counsel to represent him moving forward.

3. After conferring with Mr. Shabazz, it was agreed, subject to the Court's approval, that undersigned counsel would relieve the Federal Public Defender's Office of further representation of Mr. Abrego Garcia. Mr. Shabazz has authorized undersigned counsel to report that he has no objection to this proposed substitution.

4. Undersigned counsel, Rascoe Dean, filed his notice of appearance on June 17, 2025, and undersigned counsel Sean Hecker, Jenna Dabbs, and David Patton will file motions for admission *pro hac vice* on the same date.

WHEREFORE, based on the foregoing, Mr. Abrego Garcia respectfully requests that this Honorable Court enter an order substituting undersigned counsel as counsel of record.

Respectfully submitted,

/s/ Rascoe Dean

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/s/ Sean Hecker

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Counsel for Kilmar Abrego Garcia

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, I electronically filed the foregoing Motion with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following: Acting United States Attorney, Robert E. McGuire, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ Rascoe Dean